

March 31, 2002

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Chief, Standardization Branch,  
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To Whom It May Concern:

As a producer of lean, drug-free beef for Laura's Lean Beef, I meet and exceed strict standards for raising cattle without antibiotics and growth hormones as dictated by the Food Safety and Inspection Service. The USDA proposed regulations would allow commodity beef to be labeled and marketed in the same fashion without being held to the same exacting specifications as mine.

To advertise residue testing is deceptive and, most certainly, will confuse the consumer. If consumers think that all of these claims mean the same thing, then the USDA will regulate my meticulous raising practices out of existence. Doing so would not benefit consumers and would hurt many producers such as myself who are willing to commit to the rigorous program that Laura's Lean Beef requires in order to obtain USDA approval for its product claims. Since all producers must not exceed residue levels, anyone would be able to make a "no residue" claim.

I encourage the American Marketing Service to not water down the standard by allowing residue claims on the label. Consumers deserve labeling that is clear and meaningful. If USDA does weaken the rules, a large flood of "no residue" labels will reach unsuspecting consumers who will mistakenly believe that they are buying meat coming from cattle raised without antibiotics and growth hormones.

Respectfully yours,  
Barry Vig  
Owner and Operator